Santa Barbara County
Air Pollution Control District

JUL 29 2008

Mr. Gerardo Rios
USEPA – Permits Office (AIR 3)
75 Hawthorne Street
San Francisco, CA 94105

FID: 01734
Permit: P 12447
SSID: 05019

Re: Proposed Minor Permit Modifications to Southern California Gas Company's La Goleta Facility Part 70/APCD PTO 9584-R2

Dear Mr. Rios:

This letter transmits Proposed Minor Permit Modification Permit to Operate (PTO) 12447 for modifications to Part 70/APCD PTO 9584-R2. Included with the proposed permit is a copy of the application submitted by the applicant for this modification. We plan to issue this minor permit modification as final after September 15, 2008 provided your office has not objected to such issuance during this time interval.

If you have any questions, please contact Ben Ellenberger of my staff at (805) 961-8879.

Sincerely,

Michael Goldman, Manager
Engineering & Compliance Division

enc: Proposed PTO 12447
Application forms for Minor Modifications to SoCal Gas's La Goleta Facility

cc: La Goleta 01734 Project File SC
ECD Chron File
Brian Shafritz (cover letter only)

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Santa Barbara County
Air Pollution Control District
Post Office Box 6447
Santa Barbara, CA 93160-6447

Invoice: P 12447
Date: JUL 29 2008
Terms: Net 30 Days

300800/6600

INVOICE

BILL TO:	FACILITY:
Glenn La Fevers Southern California Gas Company PO Box 818 Goleta, CA 93116-0818	La Goleta 01734 1171 More Ranch Road Goleta

Permit: Permit to Operate (PTO) No. 12447

Fee Type: Permit Evaluation Fee (see the Fee Statement in your permit for a breakdown of the fees)

Amount Due: $ 410

REMIT PAYMENTS TO THE ABOVE ADDRESS
Please indicate the invoice number P 12447
on your remittance.

IF YOU HAVE ANY QUESTIONS REGARDING YOUR INVOICE PLEASE CONTACT
OUR ADMINISTRATION DIVISION AT (805) 961-8800

The APCD charges $25 for returned checks. Other penalties/fees may be incurred as a result of returned checks and late payment (see APCD Rule 210). Failure to pay this Invoice may result in the cancellation or suspension of your permit. Please notify the APCD regarding any changes to the above information

Santa Barbara County
Air Pollution Control District

Permit to Operate 12447
and
Part 70 Minor Modification Permit 12447

EQUIPMENT OWNER:

Southern California Gas Company 300800

EQUIPMENT OPERATOR:

Southern California Gas Company

EQUIPMENT LOCATION:

1171 More Road, Goleta

STATIONARY SOURCE/FACILITY:

So Cal Gas - La Goleta SSID: 05019
La Goleta FID: 01734

AUTHORIZED MODIFICATION:

This permit revises Permit to Operate (PTO) 9584-R2 to incorporate the changes authorized by ATC 12447. ATC 12447 authorized the replacement of catalytic converters serving seven natural gas-fired compressor engines with new DCL International DC74 catalytic convertors. There was no change to the permitted operating schedule or emissions from the engines.

EQUIPMENT DESCRIPTION:

The equipment subject to this permit is listed in the table at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

The seven natural gas-fired rich burn IC engines compress PUC natural gas for injection into an underground reservoir. The gas is stored underground until periods of high demand, when it is withdrawn from the reservoir. The engines are controlled by air-fuel ratio controllers (AFRC) and non-selective catalytic reduction (NSCR).

9.A *Standard Administrative Conditions*

The following administrative permit conditions apply to La Goleta facility:

A.1 Compliance with Permit Conditions.

(a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.

(b) This permit does not convey property rights or exclusive privilege of any sort.

(c) Noncompliance with any permit conditions is grounds for permit termination, revocation and re-issuance, modification, enforcement action, or for denial of permit renewal. Any permit non-compliance constitutes a violation of the Clean Air Act and its implementing regulations or of APCD Rules or both, as applicable.

(d) The permittee shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for noncompliance with any permit condition.

(e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.

(f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:

(i) compliance with the permit, or
(ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action.

(g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail.
[*Re: 40 CFR Part 70.6.(a)(6)(iii), APCD Rules 102, 1303.D.1.j, 1303.D.1.n, 1303.D.1.l, 1303.D.1.k, 1303.D.1.o*]

A.2 Emergency Provisions. The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a "notice of emergency" within 2 working days of the emergency. The notice of emergency shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: APCD Rule 1303.F*]

A.3 Compliance Plan.

(a) The permittee shall comply with all federally enforceable requirements that become applicable during the permit term, in a timely manner.

(b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally enforceable rules or standards.

[*Re: APCD Rule 1302.D.2*]

A.4 Right of Entry. The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 source is located or where records must be kept:

(a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;

(b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;

(c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing.

[*Re: APCD Rule 1303.D.2.a*]

A.5 Severability. The provisions of this Permit to Operate are severable and if any provision of this Permit to Operate is held invalid, the remainder of this Permit to Operate shall not be affected thereby. [*Re: APCD Rules 103, 1303.D.1.i*]

A.6 Payment of Fees. The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance monitoring expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: APCD Rules 1303.D.1.p, 1304.D.11 and 40 CFR 70.6(a)(7)*]

A.7 Deviation from Permit Requirements. The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180 days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions,* or Rule 1303.F *Emergency Provisions*. [*Re: APCD Rule 1303.D.1.g, 40 CFR 70.6(a)(3)(iii)(B)*]

A.8 Federally-enforceable Conditions. Each federally enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally enforceable or subject to the public/USEPA review [*Re: CAAA, § 502(b)(6), 40 CFR 70.6(b)*]

A.9 Reporting Requirements/Compliance Certification.
The permittee shall submit compliance certification reports to the USEPA *annually* and to the Control Officer *semi-annually*. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence

and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the "Semi-Annual Compliance Verification Report" condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [*Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c*]

A.10 Recordkeeping Requirements. The permittee shall maintain records of required monitoring information that include the following:

(a) The date, place as defined in the permit, and time of sampling or measurements;
(b) The date(s) analyses were performed;
(c) The company or entity that performed the analyses;
(d) The analytical techniques or methods used;
(e) The results of such analyses; and
(f) The operating conditions as existing at the time of sampling or measurement;

The records (electronic or hard copy), as well as all supporting information shall be maintained for a minimum of five (5) years from date of initial entry by SoCalGas and shall be made available to the APCD upon request. [*Re: APCD Rule 1303.D.1.f*]

A.11 Conditions for Permit Reopening. The permit shall be reopened and revised for cause under any of the following circumstances:

(a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30 day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.

(b) Inaccurate Permit Provisions: If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

(c) Applicable Requirement: If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the

permit for which cause to reopen exists. If the permit is reopened, and revised, it will be reissued with the expiration date that was listed in the permit before the re-opening.
[*Re: 40 CFR 70.7(f)(1)-(3), 40 CFR 70.6(a)(2)*]

9.B. Generic Conditions

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. In case of a discrepancy between the wording of a condition and the applicable APCD rule, the wording of the rule shall control.

B.1 **Circumvention (Rule 301).** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of APCD Rule 303.

B.2 **Visible Emissions (Rule 302).** SoCalGas shall not discharge into the atmosphere from any single source of emission any air contaminants for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2.(a) above.

B.3 **Nuisance (Rule 303).** No pollutant emissions from any source at SoCalGas shall create nuisance conditions. No operations shall endanger health, safety or comfort, nor shall they damage any property or business.

B.4 **PM Concentration - South Zone (Rule 305).** SoCalGas shall not discharge into the atmosphere, from any source, particulate matter in excess of the concentrations listed in Table 305(a) of Rule 305.

B.5 **Specific Contaminants (Rule 309).** SoCalGas shall not discharge into the atmosphere from any single source sulfur compounds, carbon monoxide and combustion contaminants in excess of the applicable standards listed in Sections A, E and G of Rule 309.

B.6 **Sulfur Content of Fuels (Rule 311).** SoCalGas shall not burn fuels with a sulfur content in excess of 0.5% (by weight) for liquid fuels and 239 ppmvd or 15 grains per 100 cubic feet (measured as H_2S at standard conditions) for 'gaseous fuel' or fuel gas to the combustion units. Compliance with this condition shall be based on *periodic* measurements of the fuel gas and

gaseous fuel using APCD-approved methods, and vendor-submitted data showing certified sulfur content for diesel.

B.7 **Breakdowns (Rule 505).** SoCalGas shall promptly report: (a) breakdowns that result in violations of emission limitations or restrictions prescribed by APCD Rules or by this permit, or (b) any in-stack, continuous monitoring equipment breakdowns; such reporting shall be made in conformance with the requirements of Rule 505, Sections A, B1 and D.

9.C Requirements and Equipment Specific Conditions

Federally-enforceable conditions, including emissions and operations limits, monitoring, recordkeeping and reporting are included in this section for each specific group of equipment. This section may also contain other non-generic conditions.

The conditions 9.C.1 and 9.C.18 below supersede conditions 9.C.1 and 9.C.18 in PTO 9584-R2. All other conditions in PTO 9584-R2 remain in full force and effect. (note: some condition references below refer to existing conditions in PTO 9584-R2)

C.1 **Internal Combustion Engines Providing Emission Reduction Credits (ERCs).** The following IC engine equipment items are included in this emissions unit category:

Table C.1-1 — IC Engines *Providing Emission Reduction Credits (ERCs)*

APCD IDS #	Plant ID #	Equipment Item (IC Engine) Description
1199	#2	Ingersoll-Rand LVG-82, SN 8AL126; 650 hp gas compressor
1200	#3	Ingersoll-Rand LVG-82, SN 8AL129; 650 hp gas compressor
1201	#4	Ingersoll-Rand LVG-82, SN 8AL128; 650 hp gas compressor
1202	#5	Ingersoll-Rand LVG-82, SN 8AL127; 650 hp gas compressor
1203	#6	Ingersoll-Rand KVG-62, SN 6EL265; 660 hp gas compressor
1204	#7	Ingersoll-Rand KVG-62, SN 6EL266; 660 hp gas compressor
1205	#8	Ingersoll-Rand KVG-62, SN 6EL267; 660 hp gas compressor

(a) **Emission Limitations.** Mass emissions from the IC engines with Plant ID #s 2 through 8 shall not exceed the limits listed in Tables 5.1-3 and 5.1-4. Allowable pollutant emission concentrations for the same engines are listed below. Compliance with these limits shall be assessed through compliance with the monitoring (includes source testing and ICE Inspection and Compliance Plan), record keeping and reporting conditions listed below in this permit.

Table C.1-2 - *Emission Concentration* Limits for IC Engines *Providing ERCs*

APCD IDS #	Plant ID #	Rich or Lean Burn?	Pollutant Name	Emission Limit: Concentration (ppmvd)	Emission Limit: Mass Rate (lbs/hr)
1199 thru 1205	#2 - #8	Rich Burn	*NO_x*	*50* @ 15% O_2 and (0.324 lb./MMBtu)*	90% control* and (*2.37 lbs./hr*)
1199 thru 1205	#2 - #8	Rich Burn	*VOC (ROC)*	*250 ppmv @ 15% O_2 and 0.32 lb./MMBtu*	2.34
1199 thru 1205	#2 - #8	Rich Burn	*CO*	*1,700 @ 15% O_2*	27.85

* During compliance source testing of an engine, the 50 ppmvd @15% O_2 limit for NO_X shall prevail over the alternate 90% control limit, unless catalyst inlet and outlet NO_x concentrations are simultaneously measured to demonstrate a 90% control.

(b) **Operational Restrictions.** The equipment permitted herein is subject to the following operational restrictions:

(i) *Fuel Use* — Only natural gas shall be used as fuel in the IC engines listed above.

(ii) *Engine Identification* — Each internal combustion engine shall have an identification plate or tag permanently affixed listing the make, model and serial number (or the operator's tag number). During any inspection, all identification plates or tags shall be made accessible and legible to facilitate APCD inspection of the engine.

(iii) *Heat Input Limits* — The following heat input limits apply to the IC engines:

APCD IDS #	Plant ID #	Maximum Hourly Heat Input *(MMBtu/hour)*	Maximum Annual Heat Input *(MMBtu/year)*
1199 through 1205	#2 – #8	7.30 for each engine	63,948 for each engine

(iv) *Inspection And Maintenance Plan (I&M Plan)* — The permittee shall operate in accordance with the APCD-approved, Rule 333.F required IC engine Inspection and Maintenance Plans and their subsequent APCD-approved updates.

(v) *Catalyst Operation* — For all IC engines above, (i.e., Engines # 2 through # 8) equipped with three-way NSCR catalysts, the catalysts shall operate at all times the engines are operating to reduce exhaust emissions of NO_x, ROC and CO from these engines.

(vi) IC *Engines Providing ERCs (offsets)* — For all IC engines above, the following operational limits shall apply to ensure appropriate Emission Reduction Credits to the Point Arguello Project:

A. IC Engine Compliance Plan — SoCalGas shall implement the APCD-approved IC Engine Compliance Plan (Plan) dated May 1997 (and subsequent APCD-approved

updates/revisions). The Plan includes an appendix that addresses procedures to establish and maintain proper operation and maintenance of the AFRC system (i.e., the *AFRC Compliance Plan, Appendix A*). The Plan shall be updated as necessary to reflect any new operational or maintenance procedures. The APCD also may require updates to the Plan if conditions warrant change. The *AFRC Compliance Plan (in Appendix A)* shall include the following areas:

i. Oxygen sensor operation and maintenance procedures;
ii. A copy of the manufacturer's AFRC recommended operational & maintenance procedures and specifications;
iii. AFRC calibration schedule and procedures; and,
iv. Procedures to ensure that the AFRC and catalyst are operating in compliance with all provisions of this permit, APCD Rules and Regulations, and the APCD-approved offset lease between SoCalGas and the Point Arguello Project (APCD PTO 5704). These procedures shall include an ongoing process of confirming proper AFRC and catalyst operation.

The *Plan* is hereby incorporated by reference in this permit

B. Air-Fuel Ratio Controllers — Each Air-Fuel Ratio Controller (AFRC) shall be operated, calibrated, and maintained at all times in accordance with the *AFRC Compliance Plan.*

C. Oxygen Sensors — Oxygen sensors in the stack shall be replaced by SoCalGas at least every 1,000 hours of engine operating time or sooner as described in its *IC Engine Compliance Plan.* The date of each replacement shall be recorded in the maintenance log and quarterly reports, and this data shall be made available to the APCD inspector upon request.

D. Engine/Catalyst Operation – The performance standards of each NOx emission control device shall be maintained consistent with the *IC Engine Compliance Plan.*

E. Maintenance Of Engines — Each engine shall be maintained in conformance with the permittee-designed operations and maintenance procedures necessary to minimize the pollutant emissions from the engine. A copy of these procedures shall be made available to the APCD upon request. For each engine, records shall be kept to document the maintenance activities along with any APCD-approved adjustment to the operations and maintenance procedures which may change the emissions. These maintenance and adjustment records shall be submitted to the APCD upon request.

F Replacement Reporting — SoCalGas shall inform the APCD via telephone within 24 hours and in writing within five working days of any replacement of SoCalGas-operated engines Plant ID #'s 2 - 8 or their associated control equipment. Such replacement is only allowed in accordance with the APCD Rules and Regulations. If an engine or catalyst is replaced for these equipment items (i.e., with Plant ID #'s 2 -

8), source testing shall be conducted in accordance with the source test procedures set forth in Appendix A of the *IC Engine Compliance Plan*. Source testing shall be conducted within 60 calendar days of replacement to determine the actual emission reduction associated with the new equipment. This source testing shall be in addition to, and not a replacement of, the annual source test as required by Condition 9.C.1.(c)(i) of this permit.

G Emission Reduction Credits Dedicated To Point Arguello Project — The emission reduction credits created by APCD PTO 7500 are offsets for use by the Point Arguello Project, to meet its offset requirements. Emission reduction measures implemented to create the above emission reductions shall be maintained according to the *IC Engine Compliance Plan*. The emission reduction credits are valid for the life of the Point Arguello Project only.

H Shifts In Load — To assure that offsets in APCD PTO 7500 are real, quantifiable, surplus and enforceable, SoCalGas shall not utilize a shift in load from the controlled engines with Plant ID #'s 2 - 8 to other uncontrolled point sources at the stationary source as means of generating possible additional emission reduction credits (ERCs).

For the purposes of this condition, shift in load is defined as a redirecting of fuel from a controlled emission unit to an uncontrolled emission unit for the sole purpose of increasing the uncontrolled emission unit's baseline fuel usage resulting in the generation of false surplus ERCs. If such shift in load does occur, the increased emissions at the uncontrolled emission unit shall not be considered in any baseline calculation for possible ERC for that uncontrolled emission unit.

I Monitoring Of Engine Operation — Each engine shall be equipped with a non-resettable hour meter to record its hours of operation.

(c) **Monitoring.** The equipment permitted herein is subject to the following monitoring requirements:

(i) *Source Testing* —The permittee shall perform "third party" source testing of air emissions and process parameters listed in Table 4.1 *(see Section 4 of this permit)* and adhere to the requirements of condition 9.C.14 *(Source Testing)* of this permit. The IC engines shall be tested *annually*.

Limits Exceedance — Any APCD-certified IC engine source test result which indicates the applicable Rule 333 emission limits or NSR permit-specified emission limits (as specified in Table 5.1-3), have been exceeded shall constitute a violation of this permit.

The following apply to IC Engines with (Plant ID #'s 2-8)

A. Annual Source Test Program — SoCalGas shall conduct *annual* third party source testing, using APCD-approved methodology, to ensure compliance with the required

emission reductions ("compliance testing"). The tests shall consist of three (3) forty-minute runs for each pollutant;

B. Pollutants — Tests shall be conducted to determine VOC (ROC), CO and NOx emission rates within the most recently established *optimum* AFRC set point range prior to any adjustment to these set points. Catalyst NOx reduction efficiency shall be determined if deemed necessary by the APCD;

C. Set point Adjustments —Any set point adjustments shall be made strictly according to the procedures set forth in *AFRC Compliance Plan (*Appendix A of the *IC Engine Compliance Plan).*

D. Test Parameters — Tests shall be conducted, whenever possible, at an engine load of a minimum of 90% of rated horsepower. Fuel consumption shall be monitored at each engine. Fuel heating value and fuel gas composition shall also be determined. Source tests performed at loads significantly less than 90% of rated horsepower may be invalidated or be subjected to APCD emission correction factors;

E. Test Dates — The first source test date of September 15 shall be the anniversary date for all future source tests. Source tests must be performed within one month of the anniversary date, unless otherwise approved by the APCD. More frequent source testing may be required at the discretion of the APCD upon demonstration of reasonable need. Annual source test(s) shall be performed even if an additional source test occurs during the year (e.g., for replacement or re-testing). However, if source test(s) for replacement or re-testing occurs within 30 calendar days of the anniversary date for annual source testing, it will be considered the annual source test.

F. Engines Not Operational — A source test shall not be required for equipment not in operation during the time of annual source testing. However, when such equipment becomes operational, a source test shall be performed within 30 calendar days of start-up. The APCD shall be notified in writing at least 3 working days in advance that the affected equipment will become operational.

(ii) *Compliance Assurance Monitoring:* SoCalGas shall implement the following CAM required monitoring:

A. Monitor all compliance assurance indicators for the engines in conformance with the requirements listed in the CAM Plan;

B. Log any excursions of each indicator from its limits that are set forth in the latest CAM Plan.

C. Log all periods of monitor shutdowns, monitoring malfunctions and associated monitor repairs and any required quality assurance/quality control activity periods for the monitors (i.e., the AFRC controller and the catalyst thermocouple units) as listed in the CAM Plan [*Ref: 40 CFR 64.7.(c)*]. The reason for each shutdown, e.g., indicator range excursion or malfunction, shall also be listed in the log.

(iii) *General Monitoring* — For the I.C engines the following monitoring requirements apply:

A. *Compliance Plan* — SoCalGas shall implement all monitoring provisions of its IC engine I&M/compliance plans approved by the APCD, for the applicable engines.

This includes quarterly NO_x emissions monitoring of the 7 engines per APCD Rule 333.F.

B. *Fuel Heating Value* — The gross heating value of the gaseous fuel (Btu/scf) shall be measured using approved ASTM or ARB-approved test methods semi-annually.

C. *Fuel Sulfur Content* — The total sulfur content and H_2S content of the gaseous fuel burned on the property shall be analyzed and determined semi-annually using approved ASTM or ARB-approved test methods.

D. *Operating Hours* — The hours of operation each month of each engine, *including the exempt emergency electrical generator (not included in Table 3.1-1),* shall be documented in a log, which shall be available for inspection or upon request.

E. *NO_x Monitoring* — The quarterly NO_x emission inspections per Rule 333.F shall be conducted prior to any adjustments to the minimum and maximum set points; and shall be consistent with SoCalGas source test equipment and procedures set forth in the latest APCD-approved *Appendix A* of the *IC Engine Compliance Plan.* Quarterly inspections shall consist of one (1) fifteen minute run at the previously established optimum set point.

F. *Fuel Use Metering* — Fuel use for each engine shall be monitored by an in-line fuel meter. Meter design and specifications shall be approved by the APCD. The meters shall be calibrated annually and the calibration procedures shall be approved by the APCD.

G. *AFRC Set point Optimization* — SoCalGas shall be permitted, no more than once every calendar quarter, to conduct emissions testing for the purpose of optimizing the AFRC set point range with "in-house" source test equipment. The optimization procedures shall strictly conform to those listed in the latest APCD-approved *Appendix A* of the *IC Engine Compliance Plan.*

(d) **Recordkeeping.** The permittee shall record and maintain the following information. This data shall be maintained for a minimum of five (5) years from the date of each entry and made available to the APCD upon request:

(i) *Hours* — Records documenting individual IC engine operating hours each month. The record shall document any 60-minute start-up period (Ref: Tab 2, IC Engine/AFRC Compliance Plan) required for an IC engine after it is shut-down.

(ii) *Fuel Use* — Records documenting IC engine(s) *monthly* fuel consumption (scf/month).

(iii) *Fuel Heating Value* — Records documenting the gross heating value of fuel (Btu/scf) on a semi-annual basis.

(iv) *Fuel Sulfur Content* — Records documenting the total sulfur content and H2S content of the gaseous fuel on a semi-annual basis.

(v) *Equipment Maintenance Data* — Records summary documenting engine/control device maintenance on an annual basis.

(vi) *I&M Plan Logs* — Logs documenting the parameter settings, NOx level recorded and other values required under the Inspection and Maintenance Plan for each engine subject to Rule 333.E (Emission Concentration Limits) and kept on-site.

(vii) *Equipment ID/Tags* — If an operator's tag number is used in lieu of an IC engine identification plate, written documentation which references the operator's unique IC engine ID number to a list containing the make, model, rated maximum continuous BHP and the corresponding RPM.

(viii) *Monitor Non-operational Time* – Logs documenting all non-operational times for the AFRC controller units and the catalyst temperature measurement units including the reasons for all monitor shutdowns, as monitored per Condition 9.C.1.(c)(ii)C above.

To adequately verify that the emission reductions specified in this permit are actually being attained and are attained in compliance with the APCD SIP-approved Rules and Regulations, SoCalGas shall maintain the following quarterly records for engines with Plant ID #'s 2 - 8 for a minimum of five (5) years:

(ix) *Monthly Emission Records* — Records on monthly fuel use (in units of scf), monthly hours of operation, and the number of days in operation each month. Include a copy of the most recent lab analysis of the fuel listing the average higher heating value and the sulfur content of fuel.

(x) *Set point Settings Data* — A record of the most current minimum, maximum and optimum Air Fuel Ratio Controller set points and the date these were established.

(xi) *Engine Operation Outside Settings* — A record of any continuous engine operation [as described in Section 2.f.D (*Engine Operation*)] not within minimum and maximum set points as indicated by the 'once per hour' millivolt monitoring described in the *AFRC Compliance Plan*. The minimum and maximum set points are those most currently established and which have demonstrated compliance through emissions set forth in Appendix A of the IC Engine Compliance Plan. All such excursions are to be flagged specifically in the CAM logs [see also Condition 9.C.18.(e)]

(xii) *Maintenance Records* — Records on all maintenance performed for all equipment specified in this permit including engine time settings, engine maintenance, catalyst maintenance, and air-fuel ratio controller.

(xiii) *Control Equipment Parameters* — Records on catalyst (including manufacturer, model and serial numbers), engine, air-fuel ratio controller, or sensor replacement.

(xiv) *CAM Plan Required Data* – A monthly summary of all compliance indicator data excursions and all monitor non-operational times, obtained pursuant to Conditions 9.C.1.(c)(ii)B and C above.

(e) **Reporting.** On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit.

C.18 **Compliance Assurance Monitoring (CAM) .** For the seven IC engines that are subject to the CAM Rule (*Re: 40 CFR 64*), SoCalGas shall monitor the indicators listed in Table 4.2 of PTO 9584-R2 using the procedures and devices listed in the Table 4.2, Footnotes 1, 2 and 3. In addition, SoCalGas shall implement an APCD approved CAM Plan which shall include the following elements listed below:

(a) *Indicators* – The CAM indicator(s) and the range of values for each indicator, as they apply to each IC engine subject to the CAM Rule. The Plan shall contain the justifications for each indicator and the range of values for each indicator proposed. (see *Table 4.2 of PTO 9584-R2*);

(b) *Establishing Indicator Ranges* – The indicator ranges are to be validated by SoCalGas, based on (a) acceptable engineering and technical data provided by SoCalGas *or (b)* CO, NOx, and ROC emission test procedures defined below (and as documented in the latest APCD-approved *Appendix A* of the IC Engine/AFRC Compliance Plan):

For each engine subject to CAM, one 15-minute test run shall be performed for each minimum, maximum, and optimum point of an indicator range, i.e., a total of 45 minutes for the entire testing. Testing shall be performed during typical engine operations. Each run shall demonstrate compliance with the applicable APCD Rule 333 emission limits in order to set the indicator range for ongoing CAM monitoring requirements. For establishing CAM indicator ranges, in-house testing may be used as an alternative to third party testing provided the following test methods are implemented:

- *NOx (Method)* – USEPA Method 7E
- *CO (Method)* – USEPA Method 10
- *ROC (Method)* – USEPA Method 25A or Combination of Method 25 A and Method 18 (to back-out methane and ethane from total hydrocarbons
- *Oxygen (Method)* – USEPA Method 3A

Alternate test methods may be used if approved by the APCD.

(c) *Modifying Oxygen Sensor (millivolt output) Indicator Ranges* – The millivolt indicator ranges listed in Table 4.2 of PTO 9584-R2 may be revised by SoCalGas for any engine based on in-house testing in accordance with the procedures identified in (b) above. In addition, SoCalGas shall adhere to the following:

- provide advance notification to the APCD of such testing at least seven days prior to such testing, and;
- by the next business day following completion of the testing submit via e-mail or facsimile to the APCD (Attn: Project Manager), an updated Table 4.2 as part of a proposed, revision to the CAM Plan along with an "Oxygen Sensor Millivolt Range Limits" sheet documenting the 'as found' and 'as left' NOx, ROC and CO emissions concentration of the engines affected. The updated Table 4.2 shall become effective and its provisions fully implemented immediately unless the APCD Project Manager objects in writing within three (3) business days of receipt of the updated Table 4.2 (and attachments). If the APCD objects, the previously approved millivolt ranges shall remain effective until updated ranges are approved by the APCD. SoCalGas shall retain the strip chart-data and all test records, and submit to the APCD for review upon request.

(d) *Data Capture* -- Per 40 CFR 64.6.(c)(4), a minimum 90 percent data capture rate on a quarterly basis is required for each indicator. For the purposes of minimum data capture computations, any data obtained during the following periods are not included:
- Routine monitor calibrations and inspections;
- Sudden and infrequent monitor malfunctions beyond the operator's reasonable control [Ref: 40 CFR 64.7(c)]; and,
- IC engine start-up periods, described under Tab 2 of the IC Engine/AFRC Compliance Plan [see also 9.C.1.(d)(i)].

(e) *Quality Improvement Plan Requirements* – A Quality Improvement Plan (QIP) is triggered for any engine subject to CAM Rule, if more than one (1) percent [*per 40 CFR 64.8 (a)]* of valid individual data points of temperature or 'oxygen sensor millivolt' readings obtained in any calendar quarter lie outside the CAM Plan established indicator ranges for these two parameters. SoCalGas shall immediately notify the APCD if a QIP has been triggered; and shall develop and submit such a Plan to the APCD for approval as expeditiously as practicable. The QIP submitted by SoCalGas shall meet all the requirements specified for it in 40 CFR Section 64.8 [*QIP Requirements*] at a minimum.

D. APCD-Only Conditions

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the APCD and the State of California. These conditions are issued pursuant to APCD Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*).

D.1 **Permit Activation.** All aspects of this permit are enforceable by the APCD and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:

(a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part

70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the APCD's letter.

(b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.

D.2. **Compliance**. Nothing contained within this permit shall be construed as allowing the violation of any local, state or federal rules, regulations, air quality standards or increments.

D.3. **Severability**. In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.

D.4 **Grounds for Revocation**. Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for revocation pursuant to California Health & Safety Code Section 42307 et seq.

AIR POLLUTION CONTROL OFFICER

JUL 29 2008

DATE

Attachments:

- Permit Equipment List(s)
- Permit Evaluation for Permit to Operate 12447

Notes:

- This permit is valid for one year from the date stamped above if unused.

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PERMIT EQUIPMENT LIST - TABLE A

ATC 12447 / FID: 01734 La Goleta / SSID: 05019

A PERMITTED EQUIPMENT

1 IC Engine: Gas Compressor # 2

Device ID #	**001199**	***Device Name***	**IC Engine: Gas Compressor # 2**
Rated Heat Input		*Physical Size*	650.00 Horsepower
Manufacturer	Ingersoll-Rand	*Operator ID*	Gas Compressor # 2
Model	LVG-82,	*Serial Number*	8AL126
Location Note			
Device Description			

2 IC Engine: Gas Compressor # 3

Device ID #	**001200**	***Device Name***	**IC Engine: Gas Compressor # 3**
Rated Heat Input		*Physical Size*	650.00 Horsepower
Manufacturer	Ingersoll-Rand	*Operator ID*	Gas Compressor # 3
Model	LVG-82	*Serial Number*	8AL129
Location Note			
Device Description			

3 IC Engine: Gas Compressor # 4

Device ID #	**001201**	***Device Name***	**IC Engine: Gas Compressor # 4**
Rated Heat Input		*Physical Size*	650.00 Horsepower
Manufacturer	Ingersoll-Rand	*Operator ID*	Gas Compressor # 4
Model	LVG-82	*Serial Number*	8AL128
Location Note			
Device Description			

4 IC Engine: Gas Compressor # 5

Device ID #	**001202**	***Device Name***	**IC Engine: Gas Compressor # 5**
Rated Heat Input		*Physical Size*	650.00 Horsepower
Manufacturer	Ingersoll-Rand	*Operator ID*	Gas Compressor # 5
Model	LVG-82	*Serial Number*	8AL127
Location Note			
Device Description			

5 Catalytic Converter #2

Device ID #	**110814**	***Device Name***	**Catalytic Converter #2**
Rated Heat Input		*Physical Size*	
Manufacturer	DCL International	*Operator ID*	#2
Model	DC74	*Serial Number*	
Location Note			
Device Description	This replaces an existing Johnson Matthey catalyst. The existing Woodward GECO air-fuel ratio controller will not be changed.		

6 Catalytic Converter #3

Device ID #	**110815**	***Device Name***	**Catalytic Converter #3**
Rated Heat Input		*Physical Size*	
Manufacturer	DCL International	*Operator ID*	#3
Model	DC74	*Serial Number*	
Location Note			
Device Description	This replaces an existing Johnson Matthey catalyst. The existing Woodward GECO air-fuel ratio controller will not be changed.		

7 Catalytic Converter #4

Device ID #	**110816**	***Device Name***	**Catalytic Converter #4**
Rated Heat Input		*Physical Size*	
Manufacturer	DCL International	*Operator ID*	#4
Model	DC74	*Serial Number*	
Location Note			
Device Description	This replaces an existing Johnson Matthey catalyst. The existing Woodward GECO air-fuel ratio controller will not be changed.		

8 Catalytic Converter #5

Device ID #	**110817**	***Device Name***	**Catalytic Converter #5**
Rated Heat Input		*Physical Size*	
Manufacturer	DCL International	*Operator ID*	#5
Model	DC74	*Serial Number*	
Location Note			
Device Description	This replaces an existing Johnson Matthey catalyst. The existing Woodward GECO air-fuel ratio controller will not be changed.		

9 Catalytic Converter #6

Device ID #	**110818**	***Device Name***	**Catalytic Converter #6**
Rated Heat Input		*Physical Size*	
Manufacturer	DCL International	*Operator ID*	#6
Model	DC74	*Serial Number*	
Location Note			
Device Description	This replaces an existing Johnson Matthey catalyst. The existing Woodward GECO air-fuel ratio controller will not be changed.		

10 Catalytic Converter #7

Device ID #	**110819**	***Device Name***	**Catalytic Converter #7**
Rated Heat Input		*Physical Size*	
Manufacturer	DCL International	*Operator ID*	#7
Model	DC74	*Serial Number*	
Location Note			
Device Description	This replaces an existing Johnson Matthey catalyst. The existing Woodward GECO air-fuel ratio controller will not be changed.		

11 Catalytic Converter #8

Device ID #	**110820**	***Device Name***	**Catalytic Converter #8**
Rated Heat Input		*Physical Size*	
Manufacturer	DCL International	*Operator ID*	#8
Model	DC74	*Serial Number*	
Location Note			
Device Description	This replaces an existing Johnson Matthey catalyst. The existing Woodward GECO air-fuel ratio controller will not be changed.		

12 IC Engine: Gas Compressor # 6

Device ID #	**001203**	*Device Name*	**IC Engine: Gas Compressor # 6**
Rated Heat Input		*Physical Size*	660.00 Horsepower
Manufacturer	Ingersoll-Rand	*Operator ID*	Gas Compressor # 6
Model	KVG-62	*Serial Number*	6EL265
Location Note			
Device Description			

13 IC Engine: Gas Compressor # 7

Device ID #	**001204**	*Device Name*	**IC Engine: Gas Compressor # 7**
Rated Heat Input		*Physical Size*	660.00 Horsepower
Manufacturer	Ingersoll-Rand	*Operator ID*	Gas Compressor # 7
Model	KVG-62	*Serial Number*	6EL266
Location Note			
Device Description			

14 IC Engine: Gas Compressor # 8

Device ID #	**001205**	*Device Name*	**IC Engine: Gas Compressor # 8**
Rated Heat Input		*Physical Size*	660.00 Horsepower
Manufacturer	Ingersoll-Rand	*Operator ID*	Gas Compressor # 8
Model	KVG-62	*Serial Number*	6EL267
Location Note			
Device Description			

Santa Barbara County
Air Pollution Control District

PERMIT EVALUATION FOR
AUTHORITY TO CONSTRUCT 12447

1.0 BACKGROUND

1.1 General: SoCalGas has had a history of compliance problems on their existing rich burn compressor engines. SoCalGas has changed catalytic converters and the converter housing to minimize the possibility of exhaust gasses bypassing the catalyst element. This PTO authorizes the operation of seven IC engines with new catalysts manufactured by DCL International. No changes to hours of operation or emissions from any emission unit are proposed.

1.2 Permit History (last three years):

PERMIT	FINAL ISSUED	PERMIT DESCRIPTION
PTO 11228	04/21/2005	ATC to remove and replace 3 meter tubes at La Goleta Plant. The tubes measure and monitor gas flow from the Plant to sales pipeline.
PT-70 R 11500	04/21/2005	See PTO 11228
Exempt 11522	05/13/2005	Exemption for 2 MMBtu/hr hot oil heater fired on PUC natural gas. Used in conjunction with an existing 4 MMBtu/hr hot oil heater. Engineering specs detail that both units cannot be operated at the same time (except for transient startup operations).
Exempt 11494	05/17/2005	Exemption requested for a temporary project requiring the use of 5 IC engines for 12 days of operations (maximum of 60 hours for any engine). Emissions not to exceed 0.25 ton for all pollutants aggregated.
ATC 11408	06/16/2005	Permit application to remove a number of fugitive components and install other components
ATC/PTO 11409	07/08/2005	Installation of 4 micro turbines. Removal of 4 IC engines. Changes in fugitives. Includes an NEI "D" term.
PT-70 R 11797	07/08/2005	See ATC/PTO 11409 Installation of 4 micro turbines. Removal of 4 IC engines. Changes in fugitives. Includes an NEI "D" term.
PTO 11408	10/07/2005	Permit application to remove a number of fugitive components and install other components
PTO 11622	10/11/2005	FW Pumps (2x). Cummins V-382-F2 (133 bhp) each located at 1171 More Road in Goleta
PT-70/Reeval 09584 R2	06/19/2006	Combined Part 70 Renewal and APCD Reeval. SoCal La Goleta Underground natural gas storage facility.
PT-70 ADM 12232	02/02/2007	Responsible official changed from Dan G. Neville to Joel Mumford.
PT-70 ADM 12336	08/06/2007	Glenn LaFevers replaces Joel Mumford as Responsible Official.

1.3 Compliance History (last three years):

VIOLATION TYPE	NUMBER	ISSUE DATE	DESCRIPTION OF VIOLATION
NOV	7998	09/15/2004	Failed initial s/t for NOx ppm concentration. Limit of 50 ppm was exceeded 3 times over.
NOV	7999	09/15/2004	Failed initial s/t for NOx ppm concentration. Limit of 50 ppm was exceeded nearly twice over.
NOV	8293	12/16/2004	two coatings mixed with thinners that exceeded the ROC content limits in table 1 of Rule 323
NOV	8294	12/16/2004	Use of thinner in coating (NOV #8293) confirmed as being PCR via MSDS submitted by So Cal Gas Co.
NOV	8299	02/28/2005	Sulfur compound concentration of gas stream to flare exceeded 239 ppm limit of permit. Similar infractions occurred twice in 12/2002.
NTC	8304	07/21/2005	Facility failed to calibrate both flow meters during the first and second quarters of year 2005.
NOV	8307	10/12/2005	Main Unit #2 failed annual source test emission limit per Rule 333.D.1.a. Exceeded 50 ppmv corrected to 15% oxygen. Re-test on same day-unit passed, no exceedances.
NOV	8470	10/11/2006	Failed annual source test: > 1700 ppm CO limit
MIN	8471	10/20/2006	exceeded sulfur content in gas stream combusted in flare stack during 8.75 hours of withdrawal at the facility.
NTC	6583	03/13/2007	So Cal failed to submit revised Process Monitor Calibration and Maintenance Plan within 90 days after issuance of PTO 9584-R2.
NOV	8801	09/25/2007	Failed annual source tests for exceeding NOx limits.

2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: The seven rich burn natural gas-fired IC engines affected by this project are used at a gas storage facility to compress natural gas for injection and storage in an underground reservoir.

2.2 Emission Controls: Each engine is served by a three way catalyst which reduces emissions of NOx, CO and ROCs. Catalyst performance is optimized when the engine combustion occurs under slightly fuel-rich conditions. Therefore each engine is equipped with an air to fuel ratio controller.

2.3 Emission Factors: Emission factors for each engine for NO_x CO and ROC are taken from the existing Permit to Operate and listed in this Authority to Construct. The emission factor for SO_x is based on the combustion of PUC quality natural gas. The emission factor for PM_{10} is taken from USEPA AP-42 Table 3.2-4.

2.4 Reasonable Worst Case Emission Scenario: The permit includes daily and annual fuel use limits. The reasonable worst case emission scenario is if each engine operates at its maximum permitted rate on both a

daily and annual basis. For NO_x emissions, the worst case scenario is if emissions exceed 50 ppmv @ 15% O_2, but comply with the 0.324 lb/MMBtu limit. This is permitted as long as the permittee achieves 90% control.

2.5 Emission Calculations: Emission calculation for these engines can be found in PTO 9584.

2.6 Special Calculations: There are no special calculations.

2.7 BACT Analyses: Best Available Control Technology was not required for this project.

2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the equipment is operated properly.

2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. This permit requires monitoring the AFRC output, catalyst temperatures, and the parameters required by APCD Rule 333.F.

2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the APCD.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

Rule 101. Compliance of Existing Facilities
Rule 201. Permits Required
Rule 202. Exemptions to Rule 201
Rule 205. Standards for Granting Permits
Rule 302. Visible Emissions
Rule 303. Nuisance
Rule 309. Specific Contaminants
Rule 311. Sulfur Content of Fuels
Rule 333 Control of Emissions from Reciprocating Internal Combustion Engines
Rule 505. Breakdown Procedures
Rule 801. New Source Review
Rule 802. Nonattainment Review
Rule 803. Prevention of Significant Deterioration

4.2 Rules Requiring Review:

Rule 333 – Control of Emissions From Reciprocating Internal Combustion Engines: This rule establishes emissions limits for NO_x, ROC and CO emissions from IC engines. SCDP source testing on three engines demonstrated compliance with the new catalysts. Since the source tests on three engines were well within

permitted limits, and all seven engines are the same make and model and served by identical catalysts, start up source testing was not required for the four other engines.

Rule 333 was recently amended. Rule references in this PTO have been updated to refer to the new Rule sections. The rule emission limits in the revised rule do not apply to existing engines until 2010. SoCal Gas is required by the rule to submit a revised I&M plan which reflects the requirements of the amended rule by December 19, 2008. Until the revised I&M plan is approved the currently approved plan, which reflects the requirements of the old rule, will remain in effect.

4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). For this project there is no change in emissions. The facility NEI is below the offset thresholds and is not changed by this project.

5.0 AQIA

The project is not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 Offsets: The emission offset thresholds of Regulation VIII are not exceeded.

6.2 ERCs: This permit action does not generate emission reduction credits. The original NSCR units were installed on these seven engines in order to generate ERCs for the Point Arguello project. The original NSCR units were installed prior to the adoption of Rule 333. The ERCs are still valid and the emission reductions are still enforceable by permit conditions.

7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

8.0 CEQA / LEAD AGENCY

The APCD is the lead agency under CEQA for this project, and has prepared a Notice of Exemption. This project is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A (*APCD Projects Exempt from CEQA* and *Equipment or Operations Exempt from CEQA*} provides an exemption specifically for modifications with no emissions increases. No further action is necessary.

9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTFICATION PROCESS/COMMENTS ON DRAFT PERMIT

10.1 This project was not subject to public notice.

10.2 The permittee noted several minor typos which were corrected.

11.0 FEE DETERMINATION

Fees for the APCD's work effects are assessed on a fee basis. The Project Code is *300800(So. Cal Gas Facilities*). See the *Fee Statement* Attachment for the fee calculations.

12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

AQ Engineer/Technician	7/28/08 Date	Engineering Supervisor	7/28/08 Date

13.0 ATTACHMENT(S)

- Fee Statement

PERMIT EVALUATION FOR
PERMIT TO OPERATE 12447

FEE STATEMENT

PTO No. 12447
FID: 01734 La Goleta / SSID: 05019

Santa Barbara County
Air Pollution Control District

Device Fee

Device No.	Device Name	Fee Schedule	Qty of Fee Units	Fee per Unit	Fee Units	Max or Min. Fee Apply?	Number of Same Devices	Pro Rate Factor	Device Fee	Penalty Fee?	Fee Credit	Total Fee per Device
110814	Catalytic Converter #2	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
110815	Catalytic Converter #3	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
110816	Catalytic Converter #4	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
110817	Catalytic Converter #5	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
110818	Catalytic Converter #6	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
110819	Catalytic Converter #7	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
110820	Catalytic Converter #8	A1.a	1.000	58.66	Per equipment	No	1	1.000	58.66	0.00	0.00	58.66
	Device Fee Sub-Totals =								**$410.62**	**$0.00**	**$0.00**	
	Device Fee Total =											**$410.62**

Permit Fee

Fee Based on Devices **410.62**

Fee Statement Grand Total = $410

Notes:

(1) Fee Schedule Items are listed in APCD Rule 210, Fee Schedule "A".
(2) The term "Units" refers to the unit of measure defined in the Fee Schedule.